

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

BRENT NIX, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE  
CHEMOURS COMPANY, E.I. du PONT de  
NEMOURS AND COMPANY, INC., E.I.  
DUPONT CHEMICAL CORPORATION,  
ELLIS H. MCGAUGHY, and MICHAEL E.  
JOHNSON,

Defendants.

Civil Action No. 7:17-CV-00189-D

ROGER MORTON, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE  
CHEMOURS COMPANY, E.I. du PONT de  
NEMOURS AND COMPANY, INC., E.I.  
DUPONT CHEMICAL CORPORATION, ELLIS  
H. MCGAUGHY, AND MICHAEL E.  
JOHNSON,

Defendants.

Civil Action No. 7:17-cv-00197-D

VICTORIA CAREY, MARIE BURRIS,  
MICHAEL KISER, and BRENT NIX,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

E.I. du PONT de NEMOURS AND COMPANY  
and THE CHEMOURS COMPANY FC, LLC,

Defendants.

Civil Action No. 7:17-CV-00201-D

**CLASS REPRESENTATIVES' UNOPPOSED MOTION FOR APPROVAL OF THE  
FORM AND MANNER OF FIRST SUPPLEMENTAL CLASS NOTICE**

Pursuant to Fed. R. Civ. P. 23(c), and for the reasons set forth in the accompanying Memorandum of Law ("Memorandum"), Class Representatives Victoria Carey, Marie Burris, and Brent Nix (collectively, "Class Representatives") respectfully move the Court to approve the form and manner of supplemental class notice. Subject to and without waiving any of the arguments set forth in Defendants' Motion for Class Decertification, Dkt. 629, Defendants do not oppose this motion.

Date: June 16, 2025

Respectfully submitted,

/s/ Theodore J. Leopold

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*Counsel for the Classes*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of June, 2025, I electronically filed the foregoing document with the Clerk of Court using the ECF system, with notices of case activity to be generated and sent electronically to counsel of record who are registered to receive such service.

/s/ S. Douglas Bunch  
S. Douglas Bunch